

EXHIBIT 2

Donna Watson

From: Yasamin Parsafar <yparsafar@sheppardmullin.com>
Sent: Wednesday, May 22, 2019 11:23 AM
To: W. Kyle Carpenter; Laura Chapman; cain@scottandcain.com; Mary Tom-Hum; ACTWIN-SM-Team
Cc: 'jhorton@pl-iplaw.com'; 'rpitts@pl-iplaw.com'; 'Raymond E. Stephens'
Subject: RE: ACT v. WIN, USDC ED TN, Case 3:18-cv-00186-TRM-HBG

Counsel-

We have discussed this internally. We propose that both sides agree to mutually de-designate the Sireci and Martone reports without any confidentiality designation.

If this is agreeable to you, we will need to get approval from our client and we will seek to do so as soon as I hear back from you.

We need to retain the highly confidential designation for the Nolte report.

Please let us know if you would like to discuss on the phone, otherwise we look forward to hearing from you.

Best,

Yasamin

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From: Yasamin Parsafar
Sent: Tuesday, May 21, 2019 2:51 PM
To: W. Kyle Carpenter <kcarpenter@wmbac.com>; Laura Chapman <LChapman@sheppardmullin.com>; cain@scottandcain.com; Mary Tom-Hum <MTom-Hum@sheppardmullin.com>; ACTWIN-SM-Team <ACTWIN-SM-Team@sheppardmullin.com>
Cc: 'jhorton@pl-iplaw.com' <jhorton@pl-iplaw.com>; 'rpitts@pl-iplaw.com' <rpitts@pl-iplaw.com>; 'Raymond E. Stephens' <rstephens@pl-iplaw.com>
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Thanks, Kyle.

Laura and I will discuss when she is back in the office tomorrow morning and then one of us will call you before 2pm EST.

Best,

Yasamin